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16 *CR-08-00328-RMW*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 UNITED STATES OF AMERICA,
21
22 Plaintiff,
23
24 vs.

25 PAULA LUNA ALVAREZ,
26 *et al.*,
27
28 Defendants.

No. CR-08-00328-RMW

STIPULATION AND EX PARTE
APPLICATION FOR
ORDER PERMITTING
TRAVEL TO SALIDA, CALIFORNIA


STIPULATION

The United States Attorney's Office for the Northern District of California hereby stipulates that defendants Paula Alvarez and Carlos Del Carmen may travel to Salida, California, to attend to matters relating to real property owned by defendant Paula Alvarez, or to review and transport documents located there for use by their attorneys, without further court order, provided: (1) that travel does not occur more than one time per week; (2) that it not exceed 24 hours away from San Jose, (3) that in each case of travel to Salida, defendants provide notice by telephone to their probation officer at least 24 hours prior to departure from San Jose; and (4) that their probation officer personally authorize such travel verbally to defendants.

JOSEPH P. RUSSONIELLO
UNITED STATES ATTORNEY

Date:

7/20/09


AUSA Thomas M. O'Connell

EX PARTE APPLICATION

Defendants Paula Alvarez and Carlos Del Carmen hereby apply ex parte through their respective counsel to this Court for an Order authorizing them to travel to Salida, California, under the terms and conditions set forth in the foregoing STIPULATION, without further court order.

Defendants Paula Alvarez and Carlos Del Carmen respectfully submit there is good cause to grant this ex parte application in that: (1) the United States Attorney stipulates to such order; (2) the real property referenced in the stipulation needs monitoring, maintenance and repair from time to time; and (3) there are documents located there that may be useful to the defense of their case.

Respectfully submitted,

LAW OFFICE OF GEORGE G. BENETATOS

/S/

Dated: April 1, 2009

GEORGE G. BENETATOS
Attorney for Defendant Carlos Del Carmen

LAW OFFICE OF ALEX C. PARK

/S/

Dated: April 1, 2009

ALEX C. PARK
Attorney for Defendant Paula Alvarez

ORDER

GOOD CAUSE APPEARING THIS COURT ORDERS that Defendants Paula Alvarez and Carlos Del Carmen may travel to Salida, California, without further court order provided: (1) that such travel does not occur more than one time per week; (2) that it not exceed 24 hours away from San Jose, (3) that in each case of travel to Salida, defendants provide notice by telephone to their probation officer at least 24 hours prior to departure from San Jose; and (4) that their probation officer personally authorize such travel verbally to defendants.

Date: 4/20/09

Ronald M. White
JUDGE